Appendix A to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Re- lief is Not Granted	Why a Less Restrictive Alternative to the Re- lief Sought is Not Avail- able	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Letter dated September 26, 2024 [ECF No. 390]	Letter motion characterizes the employment responsibilities and communications of Save On SP, LLC ("SaveOn") employees and characterizes SaveOn's business practices by referring to and quoting from documents produced during discovery, comprising proprietary business information. See ECF No. 390.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.	No	No objection
Exhibit 1 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 1 is an email from a SaveOn employee to other SaveOn employees inviting them to a meeting and providing a weekly agenda that references SaveOn's business	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection

E 17112	practices, comprising proprietary business information. <i>See</i> ECF No. 390 Ex. 1.	be disclosed to competitors and other market participants.		N	
Exhibit 2 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 2 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 2.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 3 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 3 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 3.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 4 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 4 is an email chain between SaveOn employees discussing billing information for and communications about a patient on a SaveOn-advised plan, comprising proprietary business information and confidential patient	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	health information. <i>See</i> ECF No. 390 Ex. 4.	Patients would also be harmed by the disclosure of their confidential			
Exhibit 5 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 5 is an email chain between SaveOn employees discussing billing information for a patient on a SaveOnadvised plan, comprising proprietary business information and confidential patient health information. See ECF No. 390 Ex. 5.	health information. If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 6 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 6 is an email chain between SaveOn employees discussing billing information for and communications about a patient on a SaveOn-advised plan, comprising proprietary business information and confidential patient health information. See ECF No. 390 Ex. 6.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 7 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 7 is an email between two SaveOn employees discussing SaveOn's drug list, comprising proprietary business information. See ECF No. 390 Ex. 7.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 8 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 8 is an email chain between SaveOn employees discussing copay assistance offered by manufacturers of drugs prescribed to patients on SaveOnadvised plans, comprising proprietary business information. See ECF No. 390 Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 9 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 9 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 9.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 10 to Letter dated September	Exhibit 10 is an email chain between SaveOn employees discussing copay assistance offered	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No	No objection

26, 2024 [ECF No. 390]	by manufacturers of drugs prescribed to patients on SaveOn- advised plans, comprising proprietary business information. See ECF No. 390 Ex. 10.	non-public business information and strategy be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 11 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 11 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 11.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 12 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 12 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 12.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 13 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 13 is an email between SaveOn employees discussing copay assistance offered by manufacturers of drugs prescribed to patients on SaveOnadvised plans,	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	comprising proprietary	be disclosed to competi-			
	business information.	tors and other market			
	See ECF No. 390 Ex. 13.	participants.			
Exhibit 14	Exhibit 14 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		
dated	employees discussing	competitive disadvantage	available to prevent the		
September	copay assistance offered	should its proprietary	disclosure of SaveOn's		
26, 2024	by manufacturers of	non-public business in-	proprietary business in-		
[ECF No.	drugs prescribed to	formation and strategy	formation.		
390]	patients on SaveOn-	be disclosed to competi-			
	advised plans,	tors and other market			
	comprising proprietary	participants.			
	business information.				
	See ECF No. 390 Ex. 14.				
Exhibit 15	Exhibit 15 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	from a SaveOn employee	SaveOn would be at a	restrictive alternative is		
dated	to her team members	competitive disadvantage	available to prevent the		
September	sharing SaveOn's	should its proprietary	disclosure of SaveOn's		
26, 2024	business practices,	non-public business in-	proprietary business in-		
[ECF No.	comprising proprietary	formation and strategy	formation.		
390]	business information.	be disclosed to competi-			
	See ECF No. 390 Ex. 15.	tors and other market			
		participants.			
Exhibit 16	Exhibit 16 is an	If relief is not granted,	It is believed that no less	No	No objection
to Letter	organizational chart of	SaveOn would be at a	restrictive alternative is		
dated	SaveOn employees,	competitive disadvantage	available to prevent the		
September	comprising proprietary	should its proprietary	disclosure of SaveOn's		
26, 2024	business information	non-public business in-	proprietary business in-		
[ECF No.	about SaveOn's business	formation and strategy	formation.		
390]	structure. See ECF No.	be disclosed to competi-			
	390 Ex. 16.	tors and other market			
		participants.			

Exhibit 19 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 19 is a letter from counsel for SaveOn to counsel for Johnson & Johnson Health Systems Inc. ("J&J") which discloses SaveOn's business practices and policies for making and recording calls to patients and healthcare providers, comprising proprietary business information. See ECF No. 390 Ex. 19.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.	No	No objection
Exhibit 20 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 20 is a letter from counsel for J&J to counsel for SaveOn. The letter describes the employment responsibilities and communications of SaveOn employees and characterizes SaveOn's business and marketing practices by referring to and quoting documents produced during discovery, comprising proprietary business information. <i>See</i> ECF No. 390 Ex. 20.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.	No	No objection
Exhibit 22 to Letter	Exhibit 22 is a letter from counsel for SaveOn	If relief is not granted, SaveOn would be at a	A redacted, public version of the letter is being	No	No objection

dated September 26, 2024 [ECF No. 390]	to counsel for J&J. The letter characterizes SaveOn's business and marketing practices by referring to and quoting documents produced during discovery, comprising proprietary business information. See ECF No. 390 Ex. 22.	competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.		
Exhibit 23 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 23 is a letter from counsel for J&J to counsel for SaveOn. The letter characterizes SaveOn's business and marketing practices by referring to and quoting documents produced during discovery, comprising proprietary business information. See ECF No. 390 Ex. 23.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.	No	No objection
Exhibit 24 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 24 is an email chain between SaveOn employees discussing billing information for and communications about a patient on a SaveOn-advised plan, comprising proprietary business information and confidential patient	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 25 to Letter	health information. <i>See</i> ECF No. 390 Ex. 24. Exhibit 25 is an email chain between counsel	Patients would also be harmed by the disclosure of their confidential health information. If relief is not granted, SaveOn would be at a	A redacted, public version of the email is being	No	No objection
dated September 26, 2024 [ECF No. 390]	for SaveOn and counsel for J&J. The chain describes the employment responsibilities and communications of SaveOn employees, comprising proprietary business information. <i>See</i> ECF No. 390 Ex. 25.	competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.		
Exhibit 28 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 28 is an email from a SaveOn employee to his team sharing information about a planned training session, comprising proprietary business information. See ECF No. 390 Ex. 28.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 30 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 30 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 30.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 31 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 31 is an email from a SaveOn employee to his team sharing training information about SaveOn's business and marketing practices, comprising proprietary business information. See ECF No. 390 Ex. 31.	be disclosed to competitors and other market participants. If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 32 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 32 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 32.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 33 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 33 is a text message conversation between two SaveOn employees about SaveOn's business and employment practices, comprising proprietary business information. See ECF No. 390 Ex. 33.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 34 to Letter dated	Exhibit 34 is a Microsoft Teams thread between SaveOn employees	If relief is not granted, SaveOn would be at a competitive disadvantage	It is believed that no less restrictive alternative is available to prevent the	No	No objection

September	discussing SaveOn's	should its proprietary	disclosure of SaveOn's		
26, 2024	business practices,	non-public business in-	proprietary business in-		
[ECF No.	comprising proprietary	formation and strategy	formation.		
390]	business information.	be disclosed to competi-			
-	See ECF No. 390 Ex. 34.	tors and other market			
		participants.			
Exhibit 35	Exhibit 35 is a text	If relief is not granted,	It is believed that no less	No	No objection
to Letter	message conversation	SaveOn would be at a	restrictive alternative is		_
dated	between two SaveOn	competitive disadvantage	available to prevent the		
September	employees about	should its proprietary	disclosure of SaveOn's		
26, 2024	SaveOn's business and	non-public business in-	proprietary business in-		
[ECF No.	employment practices,	formation and strategy	formation.		
390]	comprising proprietary	be disclosed to competi-			
	business information.	tors and other market			
	See ECF No. 390 Ex. 35.	participants.			
Exhibit 36	Exhibit 36 is a Microsoft	If relief is not granted,	It is believed that no less	No	No objection
to Letter	Teams thread between	SaveOn would be at a	restrictive alternative is		, and the second
dated	SaveOn employees	competitive disadvantage	available to prevent the		
September	discussing SaveOn's	should its proprietary	disclosure of SaveOn's		
26, 2024	business practices,	non-public business in-	proprietary business in-		
[ECF No.	comprising proprietary	formation and strategy	formation.		
390]	business information.	be disclosed to competi-			
	See ECF No. 390 Ex. 36.	tors and other market			
		participants.			
Exhibit 37	Exhibit 37 is a letter	If relief is not granted,	A redacted, public ver-	No	No objection
to Letter	from counsel for J&J to	SaveOn would be at a	sion of the letter is being		
dated	counsel for SaveOn. The	competitive disadvantage	filed. It is believed that		
September	letter describes the	should its proprietary	no less restrictive alter-		
26, 2024	employment	non-public business in-	native is available to pre-		
[ECF No.	responsibilities and	formation and strategy	vent the disclosure of		
390]	communications of	be disclosed to competi-	SaveOn's proprietary		
	SaveOn employees and	tors and other market	business in-formation.		
	characterizes SaveOn's	participants.			

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Exhibit 40 to Letter dated September 26, 2024 [ECF No. 390]	business and marketing practices by referring to and quoting documents produced during discovery, comprising proprietary business information. See ECF No. 390 Ex. 37. Exhibit 40 is a letter from counsel for SaveOn to counsel for J&J. The letter describes the employment responsibilities and communications of SaveOn employees and characterizes SaveOn's business and marketing practices by referring to and quoting documents produced during discovery, comprising proprietary business information. See ECF No. 390 Ex. 40.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.	No	No objection
Exhibit 42 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 42 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 42.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection

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Exhibit 43 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 43 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 43.	be disclosed to competitors and other market participants. If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 44 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 44 is an email chain between SaveOn employees discussing billing information for and communications about a patient on a SaveOn-advised plan, comprising proprietary business information and confidential patient health information. See ECF No. 390 Ex. 44.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 45 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 45 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection

	business information. See ECF No. 390 Ex. 45.	be disclosed to competi- tors and other market participants.			
Exhibit 46 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 46 is an internal SaveOn document outlining its business practices for a patient who declined to enroll in SaveOn, comprising proprietary business information. <i>See</i> ECF No. 390 Ex. 46.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 47 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 47 is an email chain between SaveOn employees discussing billing information for and communications about a patient on a SaveOn-advised plan, comprising proprietary business information and confidential patient health information. See ECF No. 390 Ex. 47.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 48 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 48 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	business information. See ECF No. 390 Ex. 48.	be disclosed to competi- tors and other market participants.			
Exhibit 49 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 49 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 49.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 50 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 50 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 390 Ex. 50.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 51 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 51 is an email chain between SaveOn employees discussing SaveOn's communications with patients, comprising proprietary business information. <i>See</i> ECF No. 390 Ex. 51.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection
Exhibit 56 to Letter dated	Exhibit 56 is a letter from counsel for J&J to counsel for SaveOn. The	If relief is not granted, SaveOn would be at a competitive disadvantage	A redacted, public version of the letter is being filed. It is believed that	No	No objection

September	letter describes the	should its proprietary	no less restrictive alter-		
26, 2024	employment	non-public business in-	native is available to pre-		
ECF No.	responsibilities and	formation and strategy	vent the disclosure of		
[ECF No. 390]	communications of	be disclosed to competi-			
390]		<u> </u>	SaveOn's proprietary		
	SaveOn employees and	tors and other market	business in-formation.		
	characterizes SaveOn's	participants.			
	business practices by				
	referring to and quoting				
	documents produced				
	during discovery,				
	comprising proprietary				
	business information.				
	See ECF No. 390 Ex. 56.				
Exhibit 60	Exhibit 60 is SaveOn's	If relief is not granted,	A redacted, public ver-	No	No objection
to Letter	Supplemental Responses	SaveOn would be at a	sion of the R&Os is be-		
dated	and Objections to J&J's	competitive disadvantage	ing filed. It is believed		
September	Interrogatories Nos. 4	should its proprietary	that no less restrictive al-		
26, 2024	and 16. SaveOn's R&Os	non-public business in-	ternative is available to		
[ECF No.	explain SaveOn's	formation and strategy	prevent the disclosure of		
390]	marketing strategy and	be disclosed to competi-	SaveOn's proprietary		
	business practices,	tors and other market	business information.		
	including by reference to	participants.			
	SaveOn's employees'				
	day-to-day tasks,				
	comprising proprietary				
	business information.				
	See ECF No. 390 at Ex.				
	60.				
Exhibit 61	Exhibit 61 is a	If relief is not granted,	It is believed that no less	Yes. See, e.g.,	No objection
to Letter	confidential deposition	SaveOn would be at a	restrictive alternative is	ECF No. 287	
dated	transcript of a SaveOn	competitive disadvantage	available to prevent the	at Ex. 3.	
September	employee, containing	should its proprietary	disclosure of SaveOn's		
26, 2024	direct and substantive	non-public business			

[ECF No. 390]	reference to SaveOn's business practices, comprising proprietary business information. See ECF No. 392 at Ex. 61.	information be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 62 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 62 is an email chain between SaveOn employees discussing billing information for and communications about a patient on a SaveOn-advised plan, comprising proprietary business information and confidential patient health information. See ECF No. 390 Ex. 62.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 63 to Letter dated September 26, 2024 [ECF No. 390]	Exhibit 63 is an email chain between counsel for SaveOn and counsel for J&J. The chain describes the employment responsibilities and communications of SaveOn employees, comprising proprietary business information. See ECF No. 390 Ex. 63.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the email is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.	No	No objection

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Letter dated October 14, 2024 [ECF No. 413]	Letter briefing characterizes the employment responsibilities and communications of SaveOn employees and characterizes SaveOn's business practices by referring to and quoting from documents produced during discovery, comprising proprietary business information. See ECF No. 413.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in-formation.	No	No objection
Exhibit 1 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 1 is an organizational chart of SaveOn employees, comprising proprietary business information about SaveOn's business structure. <i>See</i> ECF No. 413 Ex. 1.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 2 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 2 is an organizational chart of SaveOn employees, comprising proprietary business information about SaveOn's business structure. <i>See</i> ECF No. 413 Ex. 2.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

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Exhibit 3 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 3 is an organizational chart of SaveOn employees, comprising proprietary business information about SaveOn's business structure. <i>See</i> ECF No. 413 Ex. 3.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 4 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 4 is an organizational chart of SaveOn employees, comprising proprietary business information about SaveOn's business structure. <i>See</i> ECF No. 413 Ex. 4.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 5 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 5 is an organizational chart of SaveOn employees, comprising proprietary business information about SaveOn's business structure. See ECF No. 413 Ex. 5.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 6 to Letter dated October 14, 2024	Exhibit 6 is an email from a SaveOn employee to the SaveOn Service Center, requesting copay assistance information from the manufacturer of	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

[ECF No.	a patient's drug,	be disclosed to competi-			
413]	comprising proprietary	tors and other market			
	business information and	participants.			
	confidential patient				
	health information. See	Patients would also be			
	ECF No. 413 Ex. 6.	harmed by the disclosure			
		of their confidential			
		health information.			
Exhibit 7	Exhibit 7 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		
dated	employees discussing	competitive disadvantage	available to prevent the		
October	billing information for a	should its proprietary	disclosure of SaveOn's		
14, 2024	patient on a SaveOn-	non-public business in-	proprietary business in-		
[ECF No.	advised plan, comprising	formation and strategy	formation.		
413]	proprietary business	be disclosed to competi-			
_	information and	tors and other market			
	confidential patient	participants.			
	health information. See				
	ECF No. 413 Ex. 7.	Patients would also be			
		harmed by the disclosure			
		of their confidential			
		health information.			
Exhibit 8	Exhibit 8 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		
dated	employees sharing	competitive disadvantage	available to prevent the		
October	information about	should its proprietary	disclosure of SaveOn's		
14, 2024	SaveOn's business	non-public business in-	proprietary business in-		
[ECF No.	practices for accounts of	formation and strategy	formation.		
413]	SaveOn-advised patients	be disclosed to competi-			
	receiving manufacturer	tors and other market			
	copay assistance,	participants.			
	comprising proprietary				

	business information. See ECF No. 413 Ex. 8.				
Exhibit 9 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 9 is an email chain between SaveOn employees discussing billing information for and communications about a patient on a SaveOn-advised plan, comprising proprietary business information and confidential patient health information. See ECF No. 413 Ex. 9.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 10 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 10 is a collection of Chatter messages sent to a SaveOn employee, containing information about SaveOn's business practices and comprising proprietary business information. See ECF No. 413 Ex. 10.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 11 to Letter dated	Exhibit 11 is an email chain between SaveOn employees discussing	If relief is not granted, SaveOn would be at a competitive disadvantage	It is believed that no less restrictive alternative is available to prevent the	No	No objection

No

No

No

No objection

No objection

No objection

proprietary business in-

It is believed that no less

restrictive alternative is

available to prevent the

disclosure of SaveOn's

proprietary business in-

It is believed that no less

restrictive alternative is

available to prevent the

disclosure of SaveOn's

proprietary business in-

formation.

formation.

formation.

center representatives

on SaveOn-advised

proprietary business

information. See ECF

organizational chart of

comprising proprietary

about SaveOn's business

structure. See ECF No.

organizational chart of

comprising proprietary

about SaveOn's business

business information

SaveOn employees,

413 Ex. 13.

Exhibit 14 is an

business information

SaveOn employees,

plans, comprising

No. 413 Ex. 12. Exhibit 13 is an

who speak with patients

14, 2024

[ECF No.

Exhibit 13

to Letter

October

14, 2024

[ECF No.

Exhibit 14

to Letter

October

14, 2024 [ECF No.

dated

413]

dated

413]

413]

non-public business in-

formation and strategy

tors and other market

If relief is not granted,

SaveOn would be at a

should its proprietary

non-public business in-

formation and strategy

tors and other market

If relief is not granted,

SaveOn would be at a

should its proprietary

non-public business in-

formation and strategy

competitive disadvantage

participants.

be disclosed to competi-

competitive disadvantage

participants.

be disclosed to competi-

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Exhibit 15	structure. <i>See</i> ECF No. 413 Ex. 14.	be disclosed to competitors and other market participants. If relief is not granted,	It is believed that no less	No	No objection
to Letter dated October 14, 2024 [ECF No. 413]	organizational chart of SaveOn employees, comprising proprietary business information about SaveOn's business structure. <i>See</i> ECF No. 413 Ex. 15.	SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		
Exhibit 16 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 16 is an email chain between SaveOn employees discussing billing information for and communications about a patient on a SaveOn-advised plan, comprising proprietary business information and confidential patient health information. See ECF No. 413 Ex. 16.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 17 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 17 is an email chain between SaveOn employees discussing SaveOn's business practices for enrolling and communicating with patients, comprising	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business in- formation.	No	No objection

Exhibit 18 to Letter dated October 14, 2024 [ECF No. 413]	proprietary business information. See ECF No. 413 Ex. 17. Exhibit 18 is an organizational chart of SaveOn employees, comprising proprietary business information about SaveOn's business structure. See ECF No.	be disclosed to competitors and other market participants. If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competi-	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
	413 Ex. 18.	tors and other market participants.			
Exhibit 19 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 19 is a spreadsheet containing Salesforce records of calls made or taken by SaveOn employees. The spreadsheet contains information about SaveOn's business practices and personal identifying information about patients, comprising proprietary business information and confidential patient health information. See ECF No. 413 Ex. 19.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants. Patients would also be harmed by the disclosure of their confidential health information.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 20 to Letter dated October 14, 2024	Exhibit 20 is a spreadsheet containing Salesforce records of calls made or taken by SaveOn employees. The	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No	No objection

[ECF No.	spreadsheet contains	non-public business in-	proprietary business in-		
413]	information about	formation and strategy	formation.		
	SaveOn's business	be disclosed to competi-			
	practices and personal	tors and other market			
	identifying information	participants.			
	about patients,				
	comprising proprietary	Patients would also be			
	business information and	harmed by the disclosure			
	confidential patient	of their confidential			
	health information. See	health information.			
	ECF No. 413 Ex. 20.				
Exhibit 21	Exhibit 21 is a	If relief is not granted,	It is believed that no less	No	No objection
to Letter	spreadsheet containing	SaveOn would be at a	restrictive alternative is		
dated	Salesforce records of	competitive disadvantage	available to prevent the		
October	calls made or taken by	should its proprietary	disclosure of SaveOn's		
14, 2024	SaveOn employees. The	non-public business in-	proprietary business in-		
[ECF No.	spreadsheet contains	formation and strategy	formation.		
413]	information about	be disclosed to competi-			
	SaveOn's business	tors and other market			
	practices and personal	participants.			
	identifying information				
	about patients,	Patients would also be			
	comprising proprietary	harmed by the disclosure			
	business information and	of their confidential			
	confidential patient	health information.			
	health information. See				
	ECF No. 413 Ex. 21.				
Exhibit 22	Exhibit 22 is a	If relief is not granted,	It is believed that no less	No	No objection
to Letter	spreadsheet containing	SaveOn would be at a	restrictive alternative is		
dated	Salesforce records of	competitive disadvantage	available to prevent the		
October	calls made or taken by	should its proprietary	disclosure of SaveOn's		
14, 2024	SaveOn employees. The	non-public business in-	proprietary business in-		
	spreadsheet contains	formation and strategy	formation.		

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[ECF No.	information about	be disclosed to competi-			
413]	SaveOn's business	tors and other market			
	practices and personal	participants.			
	identifying information				
	about patients,	Patients would also be			
	comprising proprietary	harmed by the disclosure			
	business information and	of their confidential			
	confidential patient	health information.			
	health information. See				
	ECF No. 413 Ex. 22.				
Exhibit 23	Exhibit 23 is a	If relief is not granted,	It is believed that no less	No	No objection
to Letter	spreadsheet containing	SaveOn would be at a	restrictive alternative is		
dated	Salesforce records of	competitive disadvantage	available to prevent the		
October	calls made or taken by	should its proprietary	disclosure of SaveOn's		
14, 2024	SaveOn employees. The	non-public business in-	proprietary business in-		
[ECF No.	spreadsheet contains	formation and strategy	formation.		
413]	information about	be disclosed to competi-			
	SaveOn's business	tors and other market			
	practices and personal	participants.			
	identifying information				
	about patients,	Patients would also be			
	comprising proprietary	harmed by the disclosure			
	business information and	of their confidential			
	confidential patient	health information.			
	health information. See				
	ECF No. 413 Ex. 23.				
Exhibit 25	Exhibit 25 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		-
dated	employees discussing	competitive disadvantage	available to prevent the		
October	and attaching training	should its proprietary	disclosure of SaveOn's		
14, 2024	material used by SaveOn	non-public business in-	proprietary business in-		
[ECF No.	to train its call center	formation and strategy	formation.		
413]	representatives,				

F.131.05	comprising proprietary business information. <i>See</i> ECF No. 413 Ex. 25.	be disclosed to competitors and other market participants.			
Exhibit 26 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 26 is an internal SaveOn document used as training material to inform call center representatives about SaveOn's business practices, comprising proprietary business information. See ECF No. 413 Ex. 26.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 27 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 27 is an internal SaveOn document used as training material to inform SaveOn employees and call center representatives about SaveOn's business practices, comprising proprietary business information. <i>See</i> ECF No. 413 Ex. 27.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 28 to Letter dated October 14, 2024 [ECF No. 413]	Exhibit 28 is an email chain between SaveOn employees discussing and attaching training material used by SaveOn to train its call center representatives, comprising proprietary	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	1:				
	business information.				
	See ECF No. 413 Ex. 28.	70 11 01			
Exhibit 29	Exhibit 29 is a	If relief is not granted,	It is believed that no less	No	No objection
to Letter	presentation given by a	SaveOn would be at a	restrictive alternative is		
dated	SaveOn employee	competitive disadvantage	available to prevent the		
October	regarding the business	should its proprietary	disclosure of SaveOn's		
14, 2024	and billing practices of	non-public business in-	proprietary business in-		
[ECF No.	SaveOn, comprising	formation and strategy	formation.		
413]	proprietary business	be disclosed to competi-			
	information. See ECF	tors and other market			
	No. 413 Ex. 29.	participants.			
Exhibit 31	Exhibit 31 is SaveOn's	If relief is not granted,	A redacted, public ver-	No	No objection
to Letter	Supplemental Responses	SaveOn would be at a	sion of the R&Os is be-		_
dated	and Objections to J&J's	competitive disadvantage	ing filed. It is believed		
October	Interrogatories Nos. 2,	should its proprietary	that no less restrictive al-		
14, 2024	17, 18, and 20. SaveOn's	non-public business in-	ternative is available to		
[ECF No.	R&Os explain SaveOn's	formation and strategy	prevent the disclosure of		
413]	marketing strategy and	be disclosed to competi-	SaveOn's proprietary		
	business practices,	tors and other market	business information.		
	including by reference to	participants.			
	SaveOn's employees'				
	day-to-day tasks,				
	comprising proprietary				
	business information.				
	See ECF No. 413 at Ex.				
	31.				
Letter	Letter briefing	If relief is not granted,	A redacted, public ver-	No	No objection
dated	characterizes the	SaveOn would be at a	sion of the letter is being		J -
October	employment	competitive disadvantage	filed. It is believed that		
23, 2024	responsibilities and	should its proprietary	no less restrictive alter-		
[ECF No.	communications of	non-public business in-	native is available to pre-		
423]	SaveOn employees and	formation and strategy	vent the disclosure of		
123	characterizes SaveOn's	Torniación and sualegy	vent the disclosure of		
	characterizes baveon s				

	business practices by referring to and quoting from documents produced during discovery, comprising proprietary business information. <i>See</i> ECF No. 423.	be disclosed to competitors and other market participants.	SaveOn's proprietary business in-formation.		
Exhibit 64 to Letter dated October 23, 2024 [ECF No. 423]	Exhibit 64 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 423 Ex. 64.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 65 to Letter dated October 23, 2024 [ECF No. 423]	Exhibit 65 is a Microsoft Teams thread between SaveOn employees discussing SaveOn's business practices, comprising proprietary business information. See ECF No. 423 Ex. 65.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 66 to Letter dated October 23, 2024 [ECF No. 423]	Exhibit 66 is a confidential deposition transcript of a SaveOn employee, containing direct and substantive reference to SaveOn's business practices,	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	Yes. See, e.g., ECF No. 287 at Ex. 3.	No objection

	comprising proprietary	information be disclosed			
	business information.	to competitors and other			
	See ECF No. 423 at Ex.	market participants.			
	66.	market participants.			
Exhibit 71	Exhibit 71 is a Microsoft	If relief is not granted,	It is believed that no less	No	No objection
to Letter	Teams thread between	SaveOn would be at a	restrictive alternative is		
dated	SaveOn employees	competitive disadvantage	available to prevent the		
October	discussing SaveOn's	should its proprietary	disclosure of SaveOn's		
23, 2024	business practices,	non-public business in-	proprietary business in-		
[ECF No.	comprising proprietary	formation and strategy	formation.		
423]	business information.	be disclosed to competi-			
_	See ECF No. 423 Ex. 71.	tors and other market			
		participants.			
Exhibit 72	Exhibit 72 is a Microsoft	If relief is not granted,	It is believed that no less	No	No objection
to Letter	Teams thread between	SaveOn would be at a	restrictive alternative is		
dated	SaveOn employees	competitive disadvantage	available to prevent the		
October	discussing SaveOn's	should its proprietary	disclosure of SaveOn's		
23, 2024	business practices,	non-public business in-	proprietary business in-		
[ECF No.	comprising proprietary	formation and strategy	formation.		
423]	business information.	be disclosed to competi-			
	See ECF No. 423 Ex. 72.	tors and other market			
		participants.			
Exhibit 73	Exhibit 73 is a Microsoft	If relief is not granted,	It is believed that no less	No	No objection
to Letter	Teams thread between	SaveOn would be at a	restrictive alternative is		
dated	SaveOn employees	competitive disadvantage	available to prevent the		
October	discussing SaveOn's	should its proprietary	disclosure of SaveOn's		
23, 2024	business practices,	non-public business in-	proprietary business in-		
[ECF No.	comprising proprietary	formation and strategy	formation.		
423]	business information.	be disclosed to competi-			
	See ECF No. 423 Ex. 73.	tors and other market			
		participants.			
Exhibit 74	Exhibit 74 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		

dated	employees and health	competitive disadvantage	available to prevent the		
October	plan clients discussing	should its proprietary	disclosure of SaveOn's		
23, 2024	SaveOn's business	non-public business in-	proprietary business in-		
[ECF No.	practices and experiences	formation and strategy	formation.		
423]	of patients on SaveOn-	be disclosed to competi-			
	advised plans,	tors and other market			
	comprising proprietary	participants.			
	business information.				
	See ECF No. 423 Ex. 74.				
Exhibit 75	Exhibit 75 is an email	If relief is not granted,	It is believed that no less	No	No objection
to Letter	chain between SaveOn	SaveOn would be at a	restrictive alternative is		-
dated	employees discussing	competitive disadvantage	available to prevent the		
October	billing information for	should its proprietary	disclosure of SaveOn's		
23, 2024	and communications	non-public business in-	proprietary business in-		
[ECF No.	about a patient on a	formation and strategy	formation.		
423]	SaveOn-advised plan,	be disclosed to competi-			
	comprising proprietary	tors and other market			
	business information and	participants.			
	confidential patient				
	health information. See	Patients would also be			
	ECF No. 423 Ex. 75.	harmed by the disclosure			
		of their confidential			
		health information.			